

JAP:TAD

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M12-0275

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a) and
960)

JONATHAN DOLORES ACOSTA,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

Donald Farrier, being duly sworn, deposes and states that he is a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about March 17, 2012, within the Eastern District of New York and elsewhere, the defendant, JONATHAN DOLORES ACOSTA, did knowingly and intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 952(a) and 960.

(Title 21, United States Code, Section 952(a) and 960)

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant

1. On or about March 17, 2012 at approximately 5:00 a.m., defendant JONATHAN DOLORES ACOSTA arrived at John F. Kennedy International Airport in Queens, New York, aboard Jet Blue Flight No. 834, originating from Santiago, Dominican Republic.

2. A Customs and Border Protection ("CBP") officer approached the defendant JONATHAN DOLORES ACOSTA for an enforcement examination. The defendant was asked (in Spanish) if all of the luggage he was carrying and the contents belonged to him, and he replied "yes." The defendant JONATHAN DOLORES ACOSTA presented one red Tommy Hilfinger suitcase for inspection.

3. While examining the defendant's suitcase, a CBP officer noticed that the bottom of the suitcase felt unusually thick. A CBP officer probed the bottom of the suitcase, revealing a white powdery substance, which field tested positive for the presence of cocaine. Defendant JONATHAN DOLORES ACOSTA was then placed under arrest.

4. The total approximate gross weight of the cocaine found in defendant JONATHAN DOLORES ACOSTA's suitcase is 1,212.1 grams.

facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that the defendant JONATHAN DOLORES ACOSTA be dealt with according to law.


Donald Farrier
Special Agent
Homeland Security Investigations

Sworn to before me this
17th day of March, 2012

HONORABLE ROANNE L. MANN
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK